

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF M.E.S.

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ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, M.E.S., declare as follows:

2 1. I am competent to testify as to the matters herein, and make this declaration based
3 on my personal knowledge.

4 2. I am 16 years old and I am transgender. In my case this means that my gender
5 identity is male, but I was assigned female at birth.

6 3. I am using initials to identify myself for the purposes of this declaration and not
7 my name. I am doing so because I am afraid for my safety if people know that I am transgender
8 and that I participated in this lawsuit.

9 4. I came out to my parents in the seventh grade, when I was 13. It was over a winter
10 break, and things were very stressful. But I told my parents the same week that I knew for myself
11 that my gender identity was male. It was difficult at first to get my parents to understand, but
12 they eventually became supportive of my gender identity.

13 5. My parents knew a therapist who had worked with my mom and grandmother,
14 and they suggested that I see them. They were not used to working with trans people like myself,
15 and they didn't really know how to help me.

16 6. I received a diagnosis of depression and anxiety. These conditions were not new
17 to me, but I felt them worsening with the gender dysphoria that came with the changes from
18 puberty.

19 7. I received a diagnosis of gender dysphoria from a psychiatrist. I subsequently
20 received the same diagnosis from a gender health provider, who referred me to a hospital's
21 gender clinic. Six months later, I received a third diagnosis of gender dysphoria from the gender
22 clinic.

23 8. I then had to wait another few months to explore the possible interactions of
24 underlying health issues with the addition of hormone treatment. It took another two months to
25 obtain a prescription for testosterone. Two weeks later, I had to drive two hours to be trained on
26 taking shots.

1 9. Around the time that I was 14, I finally started taking testosterone. Filling
2 prescriptions was sometimes difficult. I switched testosterone formulation, and my new
3 formulation was not available at any Seattle pharmacy. I had to obtain it through an out-of-state
4 pharmacy. Often I could not obtain the correct needles, or obtain them in sufficient quantities.
5 There is a large gender clinic in Seattle, and it is one of the only clinics providing the services I
6 need. I do not blame that clinic for being unable to meet the need. There is just so much need for
7 gender-affirming care.

8 10. Waiting for gender-affirming care, and waiting for the effects of hormone
9 therapy, was one of the most difficult periods for me and my mental health. I failed classes in
10 school, and was feeling very depressed. By itself, the decision to seek medical transition
11 improved my mental health; I knew that there was light at the end of the tunnel. But hormone
12 therapy doesn't work right away. I was out as trans, but my body didn't match my gender identity
13 very well.

14 11. That summer, the summer before high school, I went to a summer camp I had
15 gone to several summers in a row. Before, I was in the girl's cabin. But this time, I was in the
16 boy's cabin. The camp counselors were very supportive, and some of them were queer
17 themselves, and they helped me. But still the difference between the way I looked and the gender
18 I am exposed me to harassment from some of the other boys. I thought to myself, "Next summer
19 I'll look totally different, and you won't have ever thought I was a girl." I'm conflicted about
20 wanting to look a certain way to impress or to fit in with people who harassed or bullied me. But
21 I do.

22 12. Things got better for me when I started high school. I had hoped to go on
23 testosterone and enter high school passing completely—to just live as a young man, and not be
24 in transition anymore. It didn't happen exactly as I hoped, but I was doing better. I met new
25 people and made friends. I became active in the school's Gay/Straight Alliance club. There were
26 still some kids who harassed me or bullied me, but for the most part other kids didn't particularly

1 care that I was trans. And the kids who harassed me also used racial slurs and acted badly. I was
2 able to get help from the teachers at the school. I've never been shy about "telling on" someone
3 if it was necessary to protect myself. But I couldn't help feeling bad that people would target me
4 that way.

5 13. I was able to have top surgery in the summer after my freshman year at high
6 school, when I was 15 years old. My parents didn't let me get it done during the school year
7 because my grades weren't very good and they didn't want me missing school. I accepted this.
8 I went through a lot more counseling and conversations with my parents before I had top surgery.
9 The surgery went well, and my recovery was surprisingly easy.

10 14. After my top surgery, misgendering became rare. People who saw me would
11 react, "Oh my god, you're a different person!" I noticed that the people who harassed me before
12 weren't bold enough to try it now. I found a new self-confidence, which allowed me to hold my
13 own with boys I previously considered jerks. I could talk to them. I know I shouldn't care about
14 that sort of thing, but annoyingly, I do.

15 15. The gender-affirming care I have received continues to create improvements in
16 my mental health and my life. My grades are improving, and I am excited about my future plans.
17 I love art—it's a huge passion for me. But I'm taking a lot of science classes, including AP
18 biology right now, and I think that a STEM field is probably what I want to work in as an adult.
19 Possibly biology or environmental science. I have visited colleges, and I have a list of about ten
20 I want to apply to.

21 16. I understand that the President of the United States has issued an Executive Order
22 affecting and preventing gender-affirming care for people under age 19. Obviously this
23 Executive Order would make the kind of gender-affirming care that I received impossible, along
24 with all of the positive changes in my life that resulted from it. Some of the changes in my life,
25 like top surgery, are something that the federal government can never take away. But I still need
26 gender-affirming care, and the Executive Order will have serious negative consequences for me

1 and many other transgender people.

2 17. Without hormone replacement therapy, I don't know how I would survive. Many
3 of my close friends who are transgender are worse off than I am, because they are not as far in
4 their transitioning as I am. I'm participating in this case for my sake, and also to protect my
5 friends. I know that trans rights were a political scapegoat before, but the Executive Order is
6 something worse, an effort to ruin millions of people's lives.

7 18. I would like to tune the news out, because it's hard to read, particularly since I'm
8 only one person and can't change the Executive Order by myself. Even if I could tune it out, the
9 Executive Order and the federal government's toxic rhetoric around trans people are impacting
10 my life and my decisions today. For example, I am choosing which colleges to apply to, and
11 some colleges and some states are now off the table because of safety concerns. I can't attend a
12 college in a state hostile to transgender people and gender-affirming care. So I miss out on
13 research opportunities and internships that would otherwise interest me. I need to stay closer to
14 the Northwest, so I can have my parents' help if things become more dangerous for transgender
15 people. I would like to focus on my life and my future, but I can't because of the Executive
16 Order.

17 I declare under penalty of perjury under the laws of the State of Washington and the
18 United States of America that the foregoing is true and correct.

19 DATED and SIGNED this ____ day of February 2025, at _____, Washington.

21 _____
M.E.S.
22 Trans Youth

23 _____
M.S.
24 Parent of M.E.S.


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18 United States of America that the foregoing is true and correct.

19 DATED and SIGNED this 3rd day of February 2025, at Mercer Island, Washington.

20
21 
22 M.E.S.
Trans Youth

23 
24 M.S.
Parent of M.E.S.
25
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